

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20540

RQ-3

October 24, 2002

Edwin S. Roberson, Treasurer
Asworth Corporation Political Action Committee
(CORPAC)
813 Ridgelake Boulevard
Memphis, TN 38120

Identification Number: C00317883

Reference: Amended Mid-Year Report (1/1/01-6/30/01), received 4/24/02 and
April Quarterly Report (1/1/02-3/31/02)

Dear Mr. Roberson:

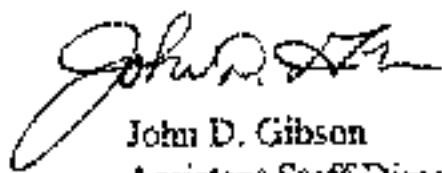
This letter is to inform you that as of October 23, 2002 the Commission has not received your response to our request for additional information, dated October 2, 2002. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by November 13, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and report(s) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you have any questions regarding this matter, please contact Maureen Benitz on our toll-free number, (800)

424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division), our local number is (202) 694-1130.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Edwin S. Roberson, Treasurer
Asworth Corporation Political Action Committee
(CORPAC)
813 Ridgelake Boulevard
Memphis, TN 38120

BCT 4/2/2002

Identification Number: C00317883

Reference: Amended Mid-Year Report (1/1/01-6/30/01), received 4/24/02 and
April Quarterly Report (1/1/02-3/31/02)

Dear Mr. Roberson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designation and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Maureen Benitz
Campaign Finance Analyst
Reports Analysis Division

SCHEDULE B (FEC Form 20)
ITEMIZED DISBURSEMENTS

ITEMS RECEIVED OR MADE PAYABLE OR FOR EACH CATEGORY OF THE DISBURSEMENT PAGE	ITEMS MADE PAYABLE OR RECEIVED OR FOR EACH CATEGORY OF THE DISBURSEMENT PAGE	POLITICAL COMMITTEE NAME, ONLY ONE	PAGE 10 of 10
200	32	33	34
75	27	26	35

Any information copied from such Reports and Statements may not be used or based by any person for the purpose of advertising contributions or disbursements, other than using the name and address of any particular contributor to solicit contributions from such contributor.

NAME OF COMMITTEE (in Part)**AMERICAN CORPORATION POLITICAL ACTION COMMITTEE (CORPAC)**

Filer Name (Last, First, Middle Initial)

A. ROLLING FOR SENATE

Mailing Address

P.O. BOX 525

City

CHARLESTON

State

SC

Zip Code

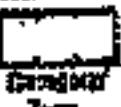
29401

Purpose of Disbursement

CONTRIBUTION

Candidate Name

ED SARKANIAN FOR CONGRESS



Office Bought

House

Senate

President

Disbursement For:

Primary

General

Other (Specify) □

State: SC

Office: VVN

Filer Name (Last, First, Middle Initial)

B. HUTCHINSON FOR SENATE

Mailing Address

P.O. BOX 896

City

ROBBERS

State

AL

Zip Code

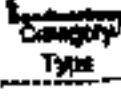
72757

Purpose of Disbursement

CONTRIBUTION

Candidate Name

THOMAS A. HUTCHINSON FOR SENATOR THOMPSON



Office Bought

House

Senate

President

Disbursement For:

Primary

General

Other (Specify) □

State: AL

Office: VVN

Filer Name (Last, First, Middle Initial)

C. RANGEL FOR CONGRESS

Mailing Address

P.O. BOX 3077

City

NEW YORK CITY

MANHATTAN, NY 10036

State

NY

Zip Code

10027

Purpose of Disbursement

CONTRIBUTION

Candidate Name

CHARLES A. RANGEL FOR CONGRESS



Office Bought

House

Senate

President

Disbursement For:

Primary

General

Other (Specify) □

State: NY

Office: VVN

Signature of Person Filing This Page (optional)

TOTAL This Filed (last page of this Report)

FEC Form 20 - Revised 10/83

Date of Disbursement

03 / 25 / 2002

Amount of Each Disbursement (in Dollars)

1000.00

Transaction ID: 88234362

Date of Disbursement

03 / 24 / 2002

Amount of Each Disbursement (in Dollars)

2000.00

NB

Transaction ID: 88234367

Date of Disbursement

03 / 23 / 2002

Amount of Each Disbursement (in Dollars)

500.00

Transaction ID: 88234341

4000.00

SCHEDULE B (FEC Form 30)
ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE
	<input type="checkbox"/> 2a <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25	10 / 19
	<input type="checkbox"/> 2b <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 28	

Any information copied from such Reports and Statements may not be used or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (or PAC)

ASWORTH CORPORATION POLITICAL ACTION COMMITTEE (CORPAC)

Full Name (Last, First, Middle Initial) A. HUTCHINSON FOR SENATE Mailing Address P. O. BOX 968 City ROGERS Purpose of Disbursement CONTRIBUTION Candidate Name		Date of Disbursement 06 / 05 / 2001 Amount of Each Disbursement this Period 2500.00  Transaction ID: 5B23.4181
Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President State: AR District:	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) ✓	Category/ Type
Full Name (Last, First, Middle Initial) B. MIKE MCINTYRE FOR CONGRESS Mailing Address P. O. BOX 1 City LUMBERTON Purpose of Disbursement CONTRIBUTION Candidate Name MIKE MCINTYRE FOR CONGRESS		Date of Disbursement 03 / 03 / 2001 Amount of Each Disbursement this Period 600.00
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: NC District:	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) ✓	Category/ Type
Full Name (Last, First, Middle Initial) C. NUSSLE FOR CONGRESS Mailing Address P. O. BOX 324 City MANCHESTER Purpose of Disbursement CONTRIBUTION Candidate Name		Date of Disbursement 05 / 03 / 2001 Amount of Each Disbursement this Period 1000.00
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: IA District:	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) ✓	Category/ Type
SUBTOTAL of Disbursements This Page (optional): TOTAL This Period (last page this line number only):		4800.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

Contributions to Federal Candidates

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political candidate to solicit contributions from such committee.

NAME OF COMMITTEE (or Fwd)

Aarworth Corporation Political Action Committee (COPAC) CDD317963

U.S. Senate Candidate
2nd Term Category of the
Disbursements Page

PAGE OF
1 1
FORTUNE NUMBER
23

<p>A. Full Name, Mailing Address and ZIP Code Hutchinson for Senate P.O. Box 1150 Little Rock, AR 72202</p> <p>B. Full Name, Mailing Address and ZIP Code</p> <p>C. Full Name, Mailing Address and ZIP Code</p> <p>D. Full Name, Mailing Address and ZIP Code</p> <p>E. Full Name, Mailing Address and ZIP Code</p> <p>F. Full Name, Mailing Address and ZIP Code</p> <p>G. Full Name, Mailing Address and ZIP Code</p> <p>H. Full Name, Mailing Address and ZIP Code</p> <p>I. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement Tim Hutchinson Senate - AR</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 12/30/00</p>	<p>Amount of Each Disbursement This Period NP \$1,000.00</p>
	<p>Purpose of Disbursement</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
	<p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>		
	<p>Purpose of Disbursement</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
	<p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>		
	<p>Purpose of Disbursement</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
	<p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>		
	<p>Purpose of Disbursement</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
	<p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>		
	<p>Purpose of Disbursement</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
	<p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>		
<p>SUBTOTAL of Disbursements This Page (applies to lines 1 through 9)</p>			\$1,000.00
<p>TOTAL This Period (last page this line number only)</p>			\$1,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

Contributions to Federal Candidates

Use section 1006(e)(4)
for each category of the
disbursed item(s) on this page

PAGE 1 OF 3

FOR LINE NUMBER

23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for general political purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (if Pmt)

Awworth Corporation Political Action Committee (CODEPAC) C00317883

A. Full Name, Mailing Address and ZIP Code Friends of Giuliani 1015 Stonebridge Park Drive Franklin, TN 37069	Purpose of Disbursement Mayor Rudy Giuliani Senate - NY Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year) 4/3/2000	Amount of Each Disbursement This Period \$1,000.00
	Purpose of Disbursement Mike McIntyre - Congress - NC (7th) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year) 4/5/2000	Amount of Each Disbursement This Period \$ 300.00
C. Full Name, Mailing Address and ZIP Code Friends of John Boehner 7909 Cincinnati-Dayton Road West Chester, OH 45069	Purpose of Disbursement John Boehner - Congress - OH (8th) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year) 4/5/2000	Amount of Each Disbursement This Period \$1,000.00
	Purpose of Disbursement Richard Burr - Congress - NC (5th) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year) 4/28/2000	Amount of Each Disbursement This Period \$1,000.00
E. Full Name, Mailing Address and ZIP Code Hutchinson for Senate P.O. Box 1150 Little Rock, AR 72202	Purpose of Disbursement Tim Hutchinson - Senate - AR Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year) 5/8/2000	Amount of Each Disbursement This Period \$1,000.00 5/10
	Purpose of Disbursement Roy Blunt - Congress - MO (3rd) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year) 5/26/2000	Amount of Each Disbursement This Period \$1,500.00
G. Full Name, Mailing Address and ZIP Code Friends of Conrad Burns 3015 S. 7th Street Arlington, VA 22204	Purpose of Disbursement Conrad Burns - Senate - MT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year) 6/7/2000	Amount of Each Disbursement This Period \$1,000.00
	Purpose of Disbursement Ed Bryant - Congress - TN (2nd) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year) 6/16/2000	Amount of Each Disbursement This Period \$1,000.00
I. Full Name, Mailing Address and ZIP Code Fletcher for Congress P.O. Box 4703 Lexington, KY 40544	Purpose of Disbursement Ernie Fletcher - Congress - KY (6th) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year) 6/16/2000	Amount of Each Disbursement This Period \$1,000.00
	SUBTOTAL of Disbursements This Page (optional)		\$9,000.00
TOTAL This Period (last page in the calendar only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Covered Disbursement Page

PAGE 1 OF 1
FOR LINE NUMBER
23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (or PAC)

Asworth Corporation Political Action Committee (CDRPAC)

C00317883

Full Name, Mailing Address and ZIP Code of Recipient, Mailing Address and ZIP Code of Committee, Mailing Address and ZIP Code of PAC	Purpose of Disbursement Name Senate - KY Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Citizens for Bunning 1717 Dixie Hwy., Suite 180 Fort Wright, KY 41011	Jim Bunning Senate - KY Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	3/9/99	\$2,000.00
B. Full Name, Mailing Address and ZIP Code Nussle for Congress P.O. Box 324 Manchester, IA	Jim Nussle Congress - IA (2nd) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	5/7/99	\$ 500.00
C. Full Name, Mailing Address and ZIP Code Friends of John Tanner P. O. Box 3301 Alexandria, VA 22302	John Tanner Congress - TN (8th) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	5/13/99	\$1,000.00 <i>MCS</i>
D. Full Name, Mailing Address and ZIP Code Hutchinson for Senate P.O. Box 998 Rogers, AR 72757	Tim Hutchinson Senate - AR Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	5/15/99	\$1,000.00
E. Full Name, Mailing Address and ZIP Code Friends of Don Sherwood 61 Warren Street Tunkhannock, PA 18657	Don Sherwood Congress - PA (10th) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	6/17/99	\$ 500.00
F. Full Name, Mailing Address and ZIP Code George Allen for Senate 2000 Glen Echo Road Suite 104 Nashville, TN 37215	George Allen Senate - VA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	6/25/99	\$2,000.00
G. Full Name, Mailing Address and ZIP Code Hayes for Congress 192 Church Street, N. Concord, NC 28025	Robin Hayes Congress - NC (6th) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	6/29/99	\$1,000.00
H. Full Name, Mailing Address and ZIP Code Fletcher for Congress P.O. Box 4703 Lexington, KY 40544	Ernest Fletcher Congress - KY (6th) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	6/29/99	\$1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Date (month, day, year)	Amount of Each Disbursement This Period
			\$9,000.00
SUBTOTAL of Disbursements This Page (optional)			\$9,000.00
TOTAL This Period (last page this line number only)			

22037815012